

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THE HERSHEY COMPANY and  
HERSHEY CHOCOLATE &  
CONFECTIONERY CORPORATION,

Plaintiffs,

v.

CONSCIOUS CARE COOPERATIVE,  
NATHAN CHRYSLER and TREK  
HOLLNAGEL

Defendants.

Case No. 2:14-cv-00815-RSL

**PLAINTIFFS' MOTION FOR  
ENTRY OF CONSENT ORDER**

**NOTE ON MOTION CALENDAR:  
AUGUST 15, 2014**

**I. RELIEF REQUESTED**

COMES NOW Plaintiffs The Hershey Company and Hershey Chocolate & Confectionary Corporation ("Hershey"), by and through its attorneys of record, and moves this Court for entry of the proposed Consent Order agreed to between Hershey and Defendants Conscious Care Cooperative, Nathan Chrysler and Trek Hollnagel ("Defendants").

**II. FACTS SUPPORTING MOTION**

Hershey and the Defendants have entered into a Settlement Agreement to resolve any and all controversies and disputes between them as of this date. Pursuant to the Settlement Agreement, the Defendants have agreed and consented to entry by the Court of the attached proposed Consent Order.

PLAINTIFFS' MOTION FOR ENTRY OF CONSENT  
ORDER - 1  
No. 2:14-cv-00815-RSL

128440.0001/6078986.1

LANE POWELL PC  
1420 FIFTH AVENUE, SUITE 4200  
P.O. BOX 91302  
SEATTLE, WA 98111-9402  
206.223.7000 FAX: 206.223.7107

III. PROPOSED ORDER

A proposed order is attached for the Court's consideration.

DATED: July 29, 2014

LANE POWELL PC

By s/Brian G. Bodine  
Brian G. Bodine, WSBA No. 22414  
bodineb@lanepowell.com  
s/Erin M. Wilson  
Erin M. Wilson, WSBA No. 42454  
wilsonem@lanepowell.com  
Telephone: 206.223.7000  
Facsimile: 206.223.7107  
Attorneys for Plaintiffs

*Of Counsel:*

Paul C. Llewellyn (*pro hac vice*)  
Kyle D. Gooch (*pro hac vice*)  
KAYE SCHOLER LLP  
425 Park Avenue  
New York, New York 10022  
Telephone: (212) 836-8000  
Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

Pursuant to RCW 9A.72.085, the undersigned certifies under penalty of perjury under the laws of the State of Washington, that on the 29<sup>th</sup> day of July, 2014, the document attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

Nathan T. Paine  
Rohde & Van Kampen PLLC  
1001 Fourth Avenue Suite 4050  
Seattle WA 98154  
Email: Npaine@rvk-law.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Executed on the 29<sup>th</sup> day of July, 2014, at Seattle, Washington.

s/Erin M. Wilson

Signature of Attorney  
WSBA No. 42454  
Typed Name: Erin M. Wilson  
Address: 1420 Fifth Avenue, Suite 4200  
P.O. Box 91302  
Seattle, WA 98111-9402  
Telephone: 206.223.7000  
Fax: 206.223.7107  
E-mail: [wilsonem@lanepowell.com](mailto:wilsonem@lanepowell.com)  
Attorney(s) For: Plaintiffs